

## EXHIBIT 19

1  
2       IN THE UNITED STATES DISTRICT COURT  
3           FOR THE NORTHERN DISTRICT OF OHIO  
4           EASTERN DIVISION

5       IN RE: NATIONAL PRESCRIPTION           MDL No. 2804  
6           OPIATE LITIGATION                   Case No. 17-md-2804

7       This document relates to:               Judge Dan  
8   Aaron Polster

9       The County of Cuyahoga v. Purdue  
10      Pharma, L.P., et al.  
11      Case No. 17-OP-45005

12      City of Cleveland, Ohio vs. Purdue  
13      Pharma, L.P., et al.  
14      Case No. 18-OP-45132

15      The County of Summit, Ohio,  
16      et al. v. Purdue Pharma, L.P.,  
17      et al.  
18      Case No. 18-OP-45090

19   VOLUME I

20   Videotaped Deposition of Kyle J. Wright

21   Washington, D.C.

22   February 28, 2019

23   9:33 a.m.

24      Reported by: Bonnie L. Russo

25      Job No. 3244302

1 record's clear on those. So I'm going to  
2 re-ask them and try to get them in a way that  
3 -- I -- I think we understood each other, but  
4 when Bonnie finishes the transcript, it's not  
5 going to read the way I think it should.

6 A. All right.

7 Q. Okay?

8 And I was asking about the  
9 obligations that retail pharmacies had. Okay?

10 A. Okay.

11 Q. So let me re-ask the question.

12 You would agree, wouldn't you, that  
13 the retail pharmacies, CVS, Rite Aid, Walgreens  
14 and Walmart, had no obligation to check on  
15 Internet pharmacies that they did not sell to,  
16 correct?

17 A. Correct.

18 MR. MIGLIORI: Objection.

19 BY MR. STEPHENS:

20 Q. And you would also agree that the  
21 retail pharmacies, Walmart, CVS, Rite Aid,  
22 Walgreens, had no -- had no obligation to check  
23 on pain clinics that they did not distribute  
24 to, correct?

25 A. Correct.

260

1 Q. Okay. All right.

2 So just a couple more topics, and  
3 then we're done.

4 I want to go back to conversations  
5 that you would have had with distributors and  
6 relating to ratios of controlled versus  
7 noncontrolled substances.

8 A. Okay.

9 Q. Okay?

10 Do you remember having those  
11 conversations with distributors?

12 A. Yes.

13 Q. Okay. And is it -- is it accurate  
14 to say that you knew that it was common for  
15 legitimate pharmacies to have a ratio of  
16 approximately 20 percent of controlled to 80  
17 percent noncontrolled?

18 A. In that area, yes.

19 Q. Okay. And higher percentages of  
20 controlled drugs could be reasonable at times,  
21 right?

22 A. Yes.

23 Q. For example, pharmacies located  
24 right next to a cancer clinic or something like  
25 that.

1 A. Correct.

2 Q. Okay. You had also testify earlier  
3 about manual systems to identify suspicious  
4 orders.

5 Do you remember that?

6 A. A manual system.

7 Q. As opposed to automated.

8 MR. MIGLIORI: Objection to form.

9 THE WITNESS: Okay.

10 BY MR. STEPHENS:

11 Q. Do you recall testimony earlier  
12 today about manual versus automated systems?

13 A. Well, that would be in the early  
14 days.

15 Q. Right.

16 So we can go back to that, right?

17 A. Okay.

18 Q. Okay. So back when people were  
19 reporting --

20 A. Paper.

21 Q. -- excess reports in -- into DEA,  
22 right?

23 A. All right, sir.

24 Q. Okay. And manual would -- would --  
25 a manual system would include people on the